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[Additional Counsel Listed on Following Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND ~~[PROPOSED]~~ ORDER
REGARDING CERTAIN FACT SHEET
DEADLINES**

This Document Relates to:

*Jane Doe CLF V.M. v. Uber Technologies,
Inc., et al.*, No. 3:25-cv-1022-CRB

*Jane Doe CLF A.H. v. Uber Technologies,
Inc., et al.*, No. 3:25-cv-1023-CRB

*Jane Doe CLF K.R. v. Uber Technologies,
Inc., et al.*, No. 3:25-cv-1025-CRB

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 *Jane Doe CLF K.G. v. Uber Technologies,*
2 *Inc., et al.*, No. 3:25-cv-1028-CRB

3 *Jane Doe CLF B.T. v. Uber Technologies,*
4 *Inc., et al.*, No. 3:25-cv-1029-CRB

5 *Jane Doe CLF H.K. v. Uber Technologies,*
6 *Inc., et al.*, No. 3:25-cv-1031-CRB

7 *Jane Doe CLF C.G. v. Uber Technologies,*
8 *Inc., et al.*, No. 3:25-cv-1033-CRB

9 *Jane Doe CLF K.J. v. Uber Technologies,*
10 *Inc., et al.*, No. 3:25-cv-1035-CRB

11 *Jane Doe CLF A.C. v. Uber Technologies,*
12 *Inc., et al.*, No. 3:25-cv-1037-CRB

13 *Jane Doe CLF T.S. v. Uber Technologies,*
14 *Inc., et al.*, No. 3:25-cv-1038-CRB

15 *Jane Doe CLF S.H. v. Uber Technologies,*
16 *Inc., et al.*, No. 3:25-cv-1040-CRB

17 *Jane Doe CLF A.B. v. Uber Technologies,*
18 *Inc., et al.*, No. 3:25-cv-1041-CRB

19 *Jane Doe CLF J.T. v. Uber Technologies,*
20 *Inc., et al.*, No. 3:25-cv-1043-CRB

21 *Jane Doe CLF L.K. v. Uber Technologies,*
22 *Inc., et al.*, No. 3:25-cv-1045-CRB

23 *Jane Doe CLF J.R. v. Uber Technologies,*
24 *Inc., et al.*, No. 3:25-cv-1046-CRB

25 *Jane Doe CLF D.T. v. Uber Technologies,*
26 *Inc., et al.*, No. 3:25-cv-1048-CRB

27 *Jane Doe CLF S.F. v. Uber Technologies,*
28 *Inc., et al.*, No. 3:25-cv-1050-CRB

Jane Doe CLF S.W. v. Uber Technologies,
Inc., et al., No. 3:25-cv-1051-CRB

Jane Doe CLF K.B. v. Uber Technologies,
Inc., et al., No. 3:25-cv-1053-CRB

Jane Doe CLF H.P. v. Uber Technologies,
Inc., et al., No. 3:25-cv-1285-CRB

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Attorneys for Clarkson Plaintiffs

STIPULATION

WHEREAS, on March 19, 2024, the Court entered Pretrial Order No. 10, which states that “Plaintiffs will either submit bona fide ride receipts or the ride information detailed in PTO No. 5,” and that Plaintiffs shall serve either the bona fide ride receipt or Pretrial Order No. 5 information sheet “within 14 days of filing, transfer, or removal to this Court for all cases filed, transferred, or removed after February 1, 2024.” Mar. 19, 2024 Pretrial Order No. 10: Fact Sheet Implementation Order at 3, Dkt. 348. The Court also set the Plaintiff Fact Sheet and Defendant Fact Sheet deadlines for cases filed after March 26, 2024 as follows: “[E]ach Plaintiff must complete and submit a PFS and execute applicable Authorizations within 30 days of the case being filed in, removed to, or transferred to MDL 3084. The Uber Defendants must complete and submit a DFS and produce Responsive Documents, within 30 days after a given plaintiff serves the ride receipt or ride information form” *Id.* at 6;

WHEREAS, Plaintiffs’ counsel does not, at present, have established communications with certain of these Plaintiffs, and an extension of the deadline for the fact sheet submissions would provide more time to submit accurate fact sheets;

WHEREAS, the parties have agreed that the deadline to provide a Plaintiff Fact Sheet for the Plaintiffs in the following cases, each represented by Clarkson Law Firm, P.C. (“Clarkson”), should be extended to March 24, 2025:

1. *Jane Doe CLF V.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1022-CRB
2. *Jane Doe CLF A.H. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1023-CRB
3. *Jane Doe CLF K.R. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1025-CRB
4. *Jane Doe CLF K.G. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1028-CRB
5. *Jane Doe CLF B.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1029-CRB
6. *Jane Doe CLF H.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1031-CRB
7. *Jane Doe CLF C.G. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1033-CRB
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9. *Jane Doe CLF A.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1037-CRB
10. *Jane Doe CLF T.S. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1038-CRB

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16. *Jane Doe CLF D.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1048-CRB

17. *Jane Doe CLF S.F. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1050-CRB

18. *Jane Doe CLF S.W. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1051-CRB

19. *Jane Doe CLF K.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1053-CRB

20. *Jane Doe CLF H.P. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1285-CRB

WHEREAS, the parties have agreed that the deadline to provide a Defendant Fact Sheet for the aforementioned Plaintiffs represented by Clarkson should be extended to April 23, 2025;

~~**WHEREAS**, the parties have agreed that these deadlines may be subject to revision based on further discussion and agreement amongst the parties (or, in the absence of agreement, via application to the Court) about why changed circumstances (e.g., a significant additional volume of filings of cases by other law firms) may warrant further adjustment to the deadlines. Nothing about this stipulation changes any obligations of the parties with respect to requirements set out in prior orders as to the provision of bona fide ride receipts, the provision of information outlined in PTO 5, or the inclusion of the applicable authorizations/responsive documents.~~

THEREFORE, the parties respectfully request the Court enter the parties' stipulation establishing that:

1. A Plaintiff Fact Sheet for each of the aforementioned Plaintiffs represented by Clarkson is due on March 24, 2025;
2. A Defendant Fact Sheet for each of the aforementioned Plaintiffs represented by Clarkson is due on April 23, 2025; and
3. ~~These deadlines may be subject to further revision, by agreement among the parties or by application to and approval of the Court, as described in the final WHEREAS clause above.~~

FILER'S ATTESTATION

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: March 6, 2025

By: /s/ Randall S. Luskey
Randall S. Luskey

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

~~PROPOSED~~ ORDER REGARDING
CERTAIN FACT SHEET DEADLINES

This Document Relates to:

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19 *Jane Doe CLF K.B. v. Uber Technologies,*
 20 *Inc., et al., No. 3:25-cv-1053-CRB*

21 *Jane Doe CLF H.P. v. Uber Technologies,*
 22 *Inc., et al., No. 3:25-cv-1285-CRB*

23 The Court hereby GRANTS the parties' stipulation as follows:

24 1. A Plaintiff Fact Sheet for the Plaintiffs in the following cases, each represented by
 25 Clarkson Law Firm, P.C., is due by March 24, 2025:

26 a. *Jane Doe CLF V.M. v. Uber Technologies, Inc., et al., No. 3:25-cv-1022-CRB*

27 b. *Jane Doe CLF A.H. v. Uber Technologies, Inc., et al., No. 3:25-cv-1023-CRB*

28 c. *Jane Doe CLF K.R. v. Uber Technologies, Inc., et al., No. 3:25-cv-1025-CRB*

d. *Jane Doe CLF K.G. v. Uber Technologies, Inc., et al., No. 3:25-cv-1028-CRB*

e. *Jane Doe CLF B.T. v. Uber Technologies, Inc., et al., No. 3:25-cv-1029-CRB*

f. *Jane Doe CLF H.K. v. Uber Technologies, Inc., et al., No. 3:25-cv-1031-CRB*

g. *Jane Doe CLF C.G. v. Uber Technologies, Inc., et al., No. 3:25-cv-1033-CRB*

- h. *Jane Doe CLF K.J. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1035-CRB
 - i. *Jane Doe CLF A.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1037-CRB
 - j. *Jane Doe CLF T.S. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1038-CRB
 - k. *Jane Doe CLF S.H. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1040-CRB
 - l. *Jane Doe CLF A.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1041-CRB
 - m. *Jane Doe CLF J.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1043-CRB
 - n. *Jane Doe CLF L.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1045-CRB
 - o. *Jane Doe CLF J.R. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1046-CRB
 - p. *Jane Doe CLF D.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1048-CRB
 - q. *Jane Doe CLF S.F. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1050-CRB
 - r. *Jane Doe CLF S.W. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1051-CRB
 - s. *Jane Doe CLF K.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1053-CRB
 - t. *Jane Doe CLF H.P. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1285-CRB
2. A Defendant Fact Sheet for each of the aforementioned Plaintiffs represented by Clarkson Law Firm, P.C. is due on April 23, 2025.
 3. ~~These deadlines may be subject to further revision, by agreement among the parties or by application to and approval of the Court, as described in the final WHEREAS clause of the parties' stipulation.~~ **No further extensions will be granted.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: March 7, 2025, 2025

